

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JACOB T. WILFONG, individually; and
DONAMARIE N. WILFONG and DONALD
J. WILFONG, individually and the marital
community composed thereof,

Plaintiffs,

v.

LYFT, INC., a foreign corporation; LYFT,
INC., d/b/a Lyft Washington, Inc., a foreign
corporation; ABDIRAZACK A. JAMMA and
JANE DOE JAMMA, individually and the
marital community composed thereof; and
ABDULKADIR A. OMAR and JANE DOE
OMAR,

Defendants.

No.: 2:24-cv-00418-RSM

STIPULATED MOTION TO CONTINUE
INITIAL DISCOVERY DEADLINES

Noted on Motion Calendar:
April 30, 2024

STIPULATION

Plaintiffs Jacob T. Wilfong, Donamarie N. Wilfong and Donald J. Wilfong, and
Defendants Lyft, Inc., a foreign corporation, and Lyft, Inc., d/b/a Lyft Washington, Inc., and
Abdirazack A. Jamma and Jane Doe Jamma (collectively, the “Parties”) respectfully request a
short extension of the initial discovery deadlines in this lawsuit.¹ The parties held their FRCP

¹ Defendants Abdulkadir A. Omar and Jane Doe Omar have not appeared in the case yet.

26(f) conference on April 23, 2024. Defendant Lyft, Inc. has made a special appearance and participated in that conference and in this Stipulation without wavier of, and expressly preserving, its right to compel arbitration with Plaintiffs pursuant to the Lyft's Terms of Service. In the FRCP 26 conference, Plaintiffs agreed to provide some information on Plaintiffs' claimed damages and the parties agreed to attempt early case resolution and settlement discussions before incurring the expense of formal discovery.

Accordingly, the Parties believe that there is good cause under Federal Rule of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of the initial discovery deadlines.

The Parties, through their counsel request and stipulate to the following proposed extensions of the deadlines in the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt. 4):

Event	Original Deadline	New Deadline Requested
Initial Disclosures Pursuant to FRCP 26(a)(1)	5/3/2024	6/7/2024
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Rule 26(f)	5/10/2024	6/14/2024

DATED: April 30, 2024


DAVIS LAW GROUP, PS By: <u>/s/ Courtney K. Hansen</u> Christopher M. Davis, WSBA #23234 Courtney K. Hansen, WSBA #43872 Attorneys for Plaintiff	MALONEY LAUERSDORF REINER, PC By: <u>/s/ Katie D. Buxman</u> Katie D. Buxman, WSBA #32867 Attorneys for Defendant Abdirazack A. Jamma and Jane Doe Jamma
BULLIVANT HOUSER BAILEY PC By: <u>/s/ Evelyn E. Winters</u> Evelyn E. Winters, WSBA #44936 E-mail: evelyn.winters@bullivant.com Vanessa G. Aaron, WSBA #60826	

1 E-mail: vanessa.aaron@bullivant.com

2 Attorneys for Defendants Lyft, Inc., a
3 foreign corporation, and Lyft, Inc., d/b/a
4 Lyft Washington, Inc., a foreign corporation

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6 **ORDER**

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8 IT IS SO ORDERED this 1st day of May, 2024.

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11 RICARDO S. MARTINEZ
12 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2024, the STIPULATED MOTION TO CONTINUE INITIAL DISCOVERY DEADLINES was served on the following parties at the following address by sending to them a true copy thereof via the method indicated below:

Courtney Hansen Chris Davis Davis Law Group PS 2101 4 th Ave. #1030 Seattle, WA 98121 courtney@davislawgroupseattle.com chris@davislawgroupseattle.com <i>Of Attorneys for Plaintiffs</i>	Evelyn Winters Vanessa Aaron Bullivant Houser Bailey PC 925 4 th Ave. #3800 Seattle, WA 98104 evelyn.winters@bullivant.com vanessa.aaron@bullivant.com <i>Of Attorneys for Lyft, Inc.</i>
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- ☒ by electronic means through the Court's ECF System on the date set forth above.
- ☐ by mailing a full, true and correct copy thereof in a sealed, first-class postage paid envelope, addressed to the attorneys as shown above, and deposited with the United States Postal Office at Portland, Oregon on the date set forth above.
- ☐ by emailing to each of the foregoing a copy thereof to the email address above.

MALONEY LAUERSDORF REINER, PC

By /s/ Katie D. Buxman

Katie D. Buxman WSBA #32867

Email: kb@mlrlegalteam.com

Ryan P. Mattson, WSBA #56204

Email: rpm@mlrlegalteam.com

Of Attorneys for Defendants Jamma